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15 Attorneys for Defendant
16 UNITED AIRLINES, INC.

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT

19 ARTHUR M. SMITH, IV, et al,

20 Plaintiffs,

21 v.

22 UNITED AIRLINES, INC., the
23 INTERNATIONAL ASSOCIATION OF
24 MACHINISTS AND AEROSPACE WORKERS,
25 LOCAL LODGE 1781; and DOES 1 to 10,

26 Defendants.

27 Case No. 3:14-cv-1763 EDL

28 **DECLARATION OF THOMAS
REARDON IN SUPPORT OF UNITED'S
MOTION TO DISMISS PLAINTIFFS'
COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF WITH
PREJUDICE**

Date: July 8, 2014
Judge: Elizabeth D. Laporte
Trial Date: TBD
Date Action Filed: April 16, 2014

29 I, Thomas Reardon, hereby declare based upon my own personal knowledge:

30 1. I am currently employed by Defendant United Airlines, Inc. as the Director, Labor

31 Relations. I have held this position since May 15, 2013. In this capacity, I am responsible for
32 overseeing United's labor relations with the International Association of Machinists and Aerospace
33 Workers ("IAM"), which represents over 28,000 United employees nationwide, including some 13,000
34 ramp (fleet) service employees covered under the United-IAM Fleet Service collective bargaining

1 agreement (CBA). My responsibilities include overseeing all aspects of the administration of the Fleet
2 Service CBA, including interacting on United's behalf with the IAM in matters relating to the
3 administration of the CBA. A true and correct copy of United's CBA with the IAM, which was in effect
4 during the relevant time period and incorporated into the allegations concerning Plaintiffs' claims, is
5 attached hereto as **Exhibit 1**.

6

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed this 29 day of May, 2014 in Chicago, IL.

11
12 
13 Thomas Reardon

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